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**September 30, 2024**

**VIA ECF AND EMAIL**

The Honorable Robyn F. Tarnofsky  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, New York 10007

**Re: *Khodakhah v. Montefiore Health System, Inc. et al.*, No 1:24-cv-00839  
Joint Proposed Scheduling Order**

Dear Magistrate Judge Tarnofsky:

We represent Plaintiff Kamran Khodakhah (“Plaintiff”) in the above-captioned action. We write on behalf of all the parties in accordance with the Court’s July 31, 2024 Order (Dkt. No. 45). The parties respectfully submit below their proposed briefing schedule regarding Plaintiff’s Amended Complaint which was filed on September 23, 2024.

The parties shall adhere to the following briefing schedule with respect to:

1. Defendants’ Motions to Dismiss shall be filed on or before November 15, 2024.
2. Plaintiff’s oppositions shall be filed on or before December 13, 2024.
3. Defendants’ replies, if any, shall be filed on or before January 17, 2025

Respectfully Submitted,

/s/ Andrew T. Miltenberg, Esq.

Andrew T. Miltenberg, Esq.

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SO ORDERED.

Dated: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
ROBYN F. TARNOFSKY  
United States District Judge

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